

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

ANDREW TATE & TRISTAN TATE,)
Plaintiffs,) Case No: 23-cv-81150-Rosenberg/Reinhart
v.)
JANE DOE, et al.,)
Defendants.)

**DECLARATION OF DEFENDANT MARY DOE IN SUPPORT OF DEFENDANT'S
RULE 12(b)(2) MOTION TO DISMISS FOR LACK OF JURISDICTION**

1. My name is [REDACTED].
2. I am an adult citizen of Moldova and Romania, currently residing in the United Kingdom, and I am competent to testify to the facts set forth in this declaration.
3. I do not now and have never lived in the State of Florida.
4. I do not and have never owned any property in the State of Florida.
5. I do not and have never lived in the United States.
6. I do not have any bank accounts in Florida, nor have I ever had any bank accounts in Florida.
7. I have never paid taxes in Florida or registered to vote in Florida.
8. I have never visited Florida.
9. I did not communicate with anyone in Florida in any matter regarding Plaintiffs Andrew Tate and/or Tristan Tate during the time periods in the Complaint.
10. I have never engaged in any activity in the state of Florida.
11. I have never committed any conduct in the state of Florida, commercial or otherwise.

12. I do not operate and have never operated any business in the State of Florida.

13. During the time period of the text messages in the Complaint, I was in Romania.

14. I have never purposefully directed any activity towards the state of Florida.

15. I did not call or communicate with any person present in Florida about Plaintiffs Andrew Tate and/or Tristan Tate during the time periods in the Complaint.

16. Upon information and belief, Plaintiffs Andrew Tate and Tristan Tate reside permanently in Romania.

17. Upon information and belief, Plaintiffs Andrew Tate and Tristan Tate do not live in Florida and have never lived in Florida.

18. Upon information and belief, Plaintiffs Andrew Tate and Tristan Tate were arrested and imprisoned in Romania.

19. As a Romanian/Moldovan citizen living in the United Kingdom, litigating any claim in the United States and in Florida, where I have no connection, is unduly costly and burdensome.

20. I solemnly affirm under penalty of perjury that the contents of the foregoing declaration are true to the best of my knowledge, information, and belief.

Date: September 24, 2023

Respectfully submitted,



